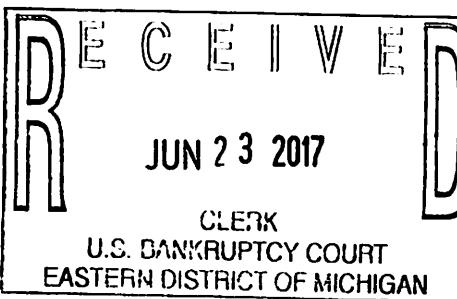


UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION



In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**COURTNEY D. PAYTON'S MOTION FOR LEAVE TO
FILE IN THE TRADITIONAL PAPER MANNER**

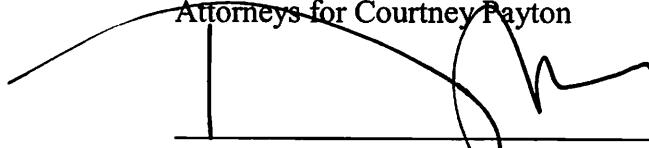
Courtney D. Payton ("Mr. Payton") by his undersigned counsel, the Mike Morse Law Firm, moves this Honorable Court for the entry of an Order granting him leave to file documents, including his Objection and Response to City of Detroit's Motion for (I) Determination that Courtney D. Payton Willfully Violated this Court's Order Granting Motion to Enforce Entered at Docket Number 10743, and (II) Awarding Compensatory and Punitive Sanctions, in the traditional, paper manner. This Motion is based on the fact that, while Mr. Payton's counsel, is admitted to practice in other federal courts having jurisdiction over Michigan matters, including the United States District Court for the Eastern District of Michigan, neither Mr. Payton nor his counsel currently have an e-filing password available to them to electronically file documents with this Honorable Court.

WHEREFORE, for the foregoing reasons, Mr. Payton respectfully requests that this Honorable Court grant the relief sought in this Motion and enter an Order granting him leave to file documents, including his Objection and Response to City of Detroit's Motion for (I) Determination that Courtney D. Payton Willfully Violated this Court's Order Granting Motion to Enforce Entered at Docket Number 10743, and (II) Awarding Compensatory and Punitive Sanctions, in the traditional, paper manner.

U.S. BANKRUPTCY COURT
E.D. MICHIGAN - D.R.
2017 JUL - 5 P
FILED (E)

Respectfully submitted,

MIKE MORSE LAW FIRM
Attorneys for Courtney Payton


Marc J. Mendelson P-52798
Donald J. Cummings P-70969
24901 Northwestern Highway, Suite 700
Southfield, MI 48075-1816
(248) 350-9050

Dated: June 16, 2017

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:	Bankruptcy Case No. 13-53846
City of Detroit, Michigan,	Judge Thomas J. Tucker
Debtor.	Chapter 9

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 16, 2017, he served a copy of the foregoing

**COURTNEY D. PAYTON'S MOTION FOR LEAVE TO FILE IN THE TRADITIONAL
PAPER MANNER** upon counsel for the City of Detroit in the manner described below: Via first class mail and email:

Marc N. Swanson, P71149
Miller, Canfield, Paddock and Stone, PLC
150 West Jefferson, Suite 2500
Detroit, MI 48226
Email: swansonm@millercanfield.com

**Respectfully submitted,
MIKE MORSE LAW FIRM
Attorneys for Plaintiff**

**Marc J. Mendelson P-52798
Donald J. Cummings P-70969
24901 Northwestern Highway, Suite 700
Southfield, MI 48075-1816
(248) 350-9050**

Dated: June 16, 2017

U.S. BANKRUPTCY COURT
E.D. MICHIGAN-DETROIT
2017 JUL -5 PM 1:35

FILED (I)